

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION**

John Doe,

Plaintiff,

v.

**Clemson University, Clemson
University Board of Trustees, James
P. Clements, individually and as agent
for Clemson University, Almeda
Jacks, individually and as agent of
Clemson University, Alesia Smith,
individually and as agent of Clemson
University, Suzanne Price,
individually and as agent of Clemson
University, Loreto Jackson,
individually and as agent of Clemson
University, David Frock, individually
and as agent of Clemson University,**

Defendants.

CA: 8:16-CV-01957-DCC

MOTION TO FILE UNDER SEAL

COMES NOW Clemson University, Clemson University Board of Trustees, James P. Clements, individually and as agent for Clemson University, Almeda Jacks, individually and as agent of Clemson University, Alesia Smith, individually and as agent of Clemson University, Suzanne Price, individually and as agent of Clemson University, Loreto Jackson, individually and as agent of Clemson University, David Frock, individually and as agent of Clemson University (hereinafter collectively “Clemson Defendants”), by and through undersigned counsel, and move

this Court for an Order pursuant to Local Civ. Rule 5.03 D.S.C. to file their Memorandum in Support of Motion to Enforce Settlement (the “Memorandum”) under seal.¹

Defendants’ Memorandum and attached exhibits contain or reference information protected under confidentiality provisions of Local Civ. Rule 16.08(C) D.S.C. regarding the confidentiality of mediation. Furthermore, Defendants’ Memorandum and attached exhibits contain or reference information which is protected under this Court’s Order Granting Plaintiff’s Motion to Proceed Under Pseudonym (ECF No. 28). Accordingly, Defendants respectfully request the Court allow the filing of their Memorandum in Support of Motion to Enforce Settlement Agreement under seal.

Undersigned counsel certifies that the present Motion complies with Local Civ. Rule 5.03. D.S.C.

Respectfully submitted,

WILLSON JONES CARTER & BAXLEY, P.A.

s/ Charles F. Turner, Jr.

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ATTORNEYS FOR DEFENDANTS

Greenville, South Carolina
May 24, 2018

¹ Pursuant to Local Civil Rules 7.04 and 7.05, DSC, Defendants state that a full explanation of the Motion is provided herein and, therefore, an additional supporting memorandum would serve no useful purpose.